

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PEGASUS DEVELOPMENT
CORPORATION and PERSONALIZED
MEDIA COMMUNICATIONS, L.L.C.,

Plaintiffs,

vs.

DIRECTV, LLC, HUGHES
ELECTRONICS CORPORATION,
TECHNICOLOR USA, INC., and PHILIPS
ELECTRONICS NORTH AMERICA
CORPORATION,

Defendants.

AND RELATED COUNTERCLAIMS

C.A. No. 00-1020-GMS

STIPULATION FOR DISMISSAL OF CERTAIN CLAIMS

Plaintiffs Pegasus Development Corporation (“Pegasus”) and Personalized Media Communications, L.L.C. (“PMC”) and Defendants Hughes Electronics Corp. (now known as the DIRECTV Group, Inc.) (“DIRECTV”), DIRECTV, LLC (originally named as DIRECTV, Inc.), Philips Electronics North America Corporation (“Philips”), and Technicolor USA, Inc. (originally named as Thomson Consumer Electronics, Inc.) (“Technicolor”) hereby stipulate, subject to the approval and order of the Court, that the following claims in this action be dismissed on the following terms:

1. Pegasus and PMC hereby dismiss with prejudice all pending claims and counterclaims they have asserted in this action against DIRECTV, DIRECTV, LLC, Philips, and Technicolor.

2. DIRECTV, DIRECTV, LLC, Philips, and Technicolor hereby dismiss with prejudice all pending claims and counterclaims they have asserted in this action against Pegasus and PMC, without waiving any defenses, including but not limited to, the validity, non-

infringement or enforceability of the patents-in-suit, without prejudice to Pegasus and PMC's later assertion of counter-defenses.

As between the parties to this Stipulation, all costs and expenses relating to this litigation (including attorney and expert fees and expenses) shall be borne solely by the party incurring same.

NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP

/s/ *R. Eric Hutz*

R. Eric Hutz (#2702)
The Nemours Building
1007 N. Orange Street
P.O. Box 2207
Wilmington, DE 19899
(302) 658-9141
Eric.hutz@novakdruce.com

*Attorneys for Pegasus Development
Corporation and Personalized Media
Communications, L.L.C.*

MORRIS, NICHOLS, ARSHT, & TUNNELL LLP

/s/ *Michael J. Flynn*

Karen Jacobs Loudon (#2556)
Mary B. Graham (2881)
Michael J. Flynn (#5333)
1201 N. Market Street
Post Office Box 1347
Wilmington, DE 19801
(302) 658-9200
klouden@mnat.com
mgramham@mnat.com
mflynn@mnat.com

*Attorneys for Technicolor USA, Inc.,
DIRECTV, LLC, and Hughes Electronics Corp.*

ASHBY & GEDDES

/s/ *Steven J. Balick*

Steven J. Balick (#2114)
Lauren E. Maguire (#4261)
Andrew C. Mayo (#5207)
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801
sbalick@ashby-geddes.com
lmaguire@ashby-geddes.com
amayo@ashby-geddes.com

*Attorneys for Philips Electronics North
America Corporation*

SO ORDERED this _____ day of July, 2013

UNITED STATES DISTRICT JUDGE